

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

TEXAS, <i>et al.</i> ,	)
	)
<i>Plaintiffs,</i>	)
	)
v.	)
	) Case No. 3:21-cv-00065
JOSEPH R. BIDEN, JR., in his official	)
capacity as President of the United	)
States, <i>et al.</i> ,	)
	)
<i>Defendants.</i>	)
	)

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**THE ATTORNEY GENERAL OF SASKATCHEWAN'S CONSENT  
MOTION FOR LEAVE TO FILE AN *AMICUS CURIAE* BRIEF**

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Saskatchewan*

The Attorney General of Saskatchewan, by and through undersigned counsel, submits this Consent Motion requesting permission from this Court to participate in this case as an *amicus curiae* and moves for leave to file its attached *Amicus Curiae* Brief. In support of this Consent Motion, the Attorney General of Saskatchewan states as follows:

1. On March 17, 2021, the Complaint for this case was filed by various states challenging President Biden’s revocation of the Keystone XL pipeline permits. *See* ECF No. 1.
2. President Biden’s actions, along with the actions of various senior executive officials, greatly impacts numerous third parties including the Province of Saskatchewan. *Id.*
3. Indeed, as the Complaint states, “the Keystone XL is part of a larger system of pipelines, which was designed . . . to transport approximately 830,000 barrels of oil from where it is produced in **Canada** and Montana to pre-existing refineries in Houston.” *Id.* at ¶ 3 (emphasis added).
4. Thus, given the Province of Saskatchewan’s unique position to the issues of this case, the attached *Amicus Curiae* Brief presents arguments that are timely, useful, and necessary to the proper administration of justice. *See, e.g.*, *Barrera v. Wolf*, 455 F. Supp.3d 330, 333, 339 (S.D. Tex. 2020) (explicitly considering and discussing the arguments found in the Amici Curiae briefs in

deciding pending motion).

5. Undersigned Counsel has obtained concurrence for the filing of this *Amicus Curiae* Brief from all parties involved supporting the granting of this Consent Motion. *See Freedom From Religion Found., Inc. v. Mack*, No. CV H-17-881, 2018 WL 6981153, at n.1 (S.D. Tex. Sept. 27, 2018) (granting an unopposed motion for leave to file an *Amicus Curiae* Brief).

WHEREFORE, the Attorney General of Saskatchewan therefore requests that this Court grant this Consent Motion and enter the attached *Amicus Curiae* Brief.

Respectfully submitted this 7th day of September, 2021.

**MCGUIREWOODS LLP**

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\*Motions for admission *pro hac vice* forthcoming